

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

RANDY KIRKPATRICK

DOB: x/xx/1988

Case No.23-957M(NJ)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/22/2023 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §2252(a)(4)(B) and (b)(2)

Possession of Child Pornography

This criminal complaint is based on these facts:

Please see attached Affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Sarah Dettmering, Special Agent, FBI

Printed name and title

Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1

Date: 7/17/2023



Judge's signature

City and state: Milwaukee, Wisconsin

Honorable Nancy Joseph, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Sarah Dettmering, being first duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since January 2018 and am currently assigned to the Milwaukee Division as a member of the Milwaukee Child Exploitation and Human Trafficking Task Force. My duties include investigating criminal violations relating to child sexual exploitation and child pornography. While employed by the FBI, I have investigated federal criminal violations related to complex financial crimes, health care fraud, cybercrimes, child exploitation, and child pornography.

2. I have received training from the FBI specific to investigating child pornography and child exploitation crimes and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in different forms of media including computer media. As a result of my training, experience, and discussions with other law enforcement officers assigned to investigate child pornography and child exploitation, I am familiar with methods by which electronic devices are used as the means for receiving, transmitting, possessing, and distributing images and videos depicting minors engaged in sexually explicit conduct. I have also received training and gained experience in interview and interrogation techniques with enhanced training specific to cybercrimes, social media search warrants, residential search warrants, interviews and interrogations of subjects of criminal investigations, electronic device identification and forensic review.

3. The facts contained in this affidavit are known to me through my personal knowledge, training, and experience, and through information provided to me by other law

enforcement officers, who have provided information to me during the course of their official duties and whom I consider truthful and reliable.

4. Based upon the information described below, I submit that probable cause exists to believe that Randy Kirkpatrick has committed multiple violations of possession of child pornography in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2) while residing at 1025 Park Avenue, South Milwaukee, Wisconsin.

5. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not set forth all of my knowledge about this matter.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

6. On or about March 23, 2023, I was conducting an online investigation on the BitTorrent Peer to Peer filesharing network for offenders sharing CSAM (child sexual abuse material, commonly known as “child pornography”). An investigation was initiated for a device being operated with the IP Address 98.144.212.72 because it was associated with a shared torrent which contained at least one file consistent with the definition of CSAM.

7. Using a computer running investigative BitTorrent software, a direct connection was made to the device at IP Address 98.144.212.72 and a download was successfully completed of a file with the name 11yo Preteen BJ + Anal Fuck with 10yo Boy Neighbour and His Dad.AVI. The device at IP Address 98.144.212.72 was the sole candidate for this download, and as such, this file was downloaded directly from this IP address. This file is described as follows:

- Full color video approximately 13 minutes and 33 seconds long which shows a prepubescent boy, approximately seven to 10 years old, standing completely nude. A

completely nude prepubescent girl, approximately eight to ten years old performs oral sex on the boy. A completely nude adult male appears, and the juvenile girl performs oral sex on the adult male. The girl then places both the juvenile boy's and the adult male's penises in her mouth. The juvenile boy performs oral sex on the juvenile girl, then inserts his penis into her vagina and they engage in intercourse.

8. On or about March 24, 2023, I was conducting an online investigation on the BitTorrent network for offenders sharing CSAM. My attention was again directed to IP Address 98.144.212.72 because it was associated with a shared torrent which contained at least one file consistent with the definition of CSAM.

9. Using a computer running investigative BitTorrent software, a direct connection was made to the device at IP Address 98.144.212.72 and a download was successfully completed of a file with the name Orgasm compilation.avi. The device at IP Address 98.144.212.72 was the sole candidate for this download, and as such, this file was downloaded directly from this IP address. This file is described as follows:

- This video is approximately two hours and 56 minutes long and shows a compilation of many different videos of different juvenile girls, which are individually consistent with the definition of CSAM. Examples of videos from the compilation are described below:
 - The first video shows a juvenile girl, approximately six to eight years old sitting completely nude facing the camera with her legs spread to expose her vagina which the girl is rubbing with her hand.

- A completely nude prepubescent girl, approximately three to four years old is lying on a bed with her legs spread to expose her vagina. An adult hand rubs a white cylindrical object, consistent with a sex toy on the girl's vagina, the girl then takes the object and rubs herself.
- A prepubescent girl, approximately five to seven years old, is lying on her back completely nude while an adult male rubs her exposed vagina.
- A prepubescent girl, approximately three to four years old lying completely nude on her back while an adult male holds down her arms and has his face moving between her legs appearing to perform oral sex on the girl.
- A prepubescent girl, approximately two years old is lying on her back with her legs spread and vagina exposed. An adult male is rubbing the girl's vagina with his hand.

10. On or about April 14, 2023, an administrative subpoena was served on Charter Communications Inc. (Charter), by an Operational Support Technician for the FBI, for the IP Address 98.144.212.72 on the dates of the above-described downloads. On or about April 20, 2023, Charter provided a response to the administrative subpoena, which contained the following information:

- Subscriber Name: Randy Kirkpatrick
- Address: 1025 PARK AVE, SOUTH MILWAUKEE, WI 531721331
- Lease Start Date: 09/06/2021 02:05 AM

11. On or about May 18, 2023, FBI Special Agents conducted surveillance at 1025 Park Avenue, South Milwaukee (SUBJECT PREMISES) and observed KIRKPATRICK leave the

residence at approximately 6:57 AM CST in the SUBJECT VEHICLE. No other residents or vehicles were observed during this surveillance.

12. On or about May 19, 2023, FBI Special Agents conducted surveillance at the SUBJECT PREMISES and observed KIRKPATRICK leave the residence at approximately 6:00 AM CST in the SUBJECT VEHICLE. No other residents or vehicles were observed during this surveillance.

13. On or about June 14, 2023, a federal search warrant issued in the Eastern District of Wisconsin was issued for Kirkpatrick's residence, 1025 Park Ave, South Milwaukee, Wisconsin (SUBJECT PREMISES), Kirkpatrick's vehicle - a blue Toyota Highlander license plate AFV-6384 (SUBJECT VEHICLE), and upon the person of Kirkpatrick.

14. On or about June 22, 2023, the federal search warrant described above was executed by the FBI.

15. During the course of the search a black Samsung cell phone, IMEI 354564112166530, was located on a shelf in the hallway closet of the residence. On or about July 6, 2023, I reviewed a forensic download of this cell phone, and made the following observations:

- Multiple identifiers showed that the user of the phone was Kirkpatrick. This included but was not limited to:
 - Facebook Messenger, Venmo, Snapchat, TikTok, and Credit Card accounts in the name of "Randy Kirkpatrick"
 - Email addresses: rankirk20@gmail.com, rkirkpatrick@quad.com
 - Multiple selfie images of Kirkpatrick

- Approximately 428 images and 48 videos consistent with the definition of CSAM. Examples of the CSAM files observed are described below:

- **File Name:** -5694766178909817401.0 • **Modified:** 5/5/2023 1:24:09 AM (UTC+0) • **MD5 Hash:** c78795d5adf3052e4a6382cf97edf736

Description: This file is a full color still image of a completely nude prepubescent female, approximately five to seven years old, and a completely nude adult male. The adult male is holding the girl upside down by her waist so that her face is level with his penis and her legs are on either side of his face. The adult male's penis is inserted into the girl's mouth and his face is between her legs appearing to perform oral sex on her. There are typed words on the image which state "Tara 7yr #18 Mmmm..... I love your cock daddy, You know, I thought 69 was just a number that came after 68."

- **File Name:** 7565984218211205213.0 • **Modified:** 4/14/2023 4:33:17 PM (UTC+0) • **MD5 Hash:** c4ddd33aaf256a5df667ecf9d78ae1877

Description: This file is a full color still image of a completely nude prepubescent female, approximately five to seven years old, and a completely nude adult male. The girl is lying on her back with a purple blindfold over her eyes, and a thick purple collar around her neck. The girl's legs have purple straps around them which are chained to purple straps around the girl's arms, causing her legs to be spread and her knees bent up.

The adult male is between the girl's legs and he is using his hand to insert his penis into her vagina.

○ **Name:** 7yo niece (private 2011) - FUCK ME.avi • **Created:** 6/20/2023 7:51:04 PM (UTC+0) • **MD5 Hash:** 8afb861fa68a687c3acf8d0f16ff900e • **Duration:** 1 minute 25 seconds
Description: This file is a full color video of a completely nude prepubescent female, approximately five to seven years old, and a nude adult male. The girl is lying on her back with her knees bent and spread to expose her nude vagina. The words "FUCK ME" are written on the girl's stomach and there is an arrow pointing to her vagina. An adult male uses his hand to push his penis into the girl's vagina. The male also rubs his penis on the girl's vagina then continues to insert it into her vagina.

CONCLUSION

16. Based on the information above, I submit that there is probable cause to believe that on June 22, 2023, RANDY KIRKPATRICK committed multiple violations of possession of child pornography in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2) while residing at 1025 Park Ave, South Milwaukee, Wisconsin.